

POLREP 001 and SPECIAL BULLETIN A
West Dauphin Chemical Site
2932 Dauphin Street
Philadelphia, PA 19132

Date: August 17, 2000

To: Regional Response Center

From: Jack Kelly, On-Scene Coordinator
Removal Response Section (3HS31)

Subject: Notification of \$200,000 Emergency Removal Action

I. Introduction

The On-Scene Coordinator (OSC) conducted an assessment of the West Dauphin Chemical Site (Site) located at 2932 Dauphin Street in Philadelphia, Pennsylvania in accordance with the National Oil and Hazardous Substances Contingency Plan (NCP), 40CFR Part 300. The assessment revealed the threat of release of hazardous substances to the environment posing a threat to public health or welfare or the environment. The OSC has determined that the Site meets the criteria of Section 300.415 of the NCP for initiating a Removal Action. As a result of site conditions, an emergency removal response action pursuant to Section 104 of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) as amended, 42, USC Section 9604, is necessary at the Site. Pursuant to Delegation of Authority 14-1-A, the OSC is obligating CERCLA funding in the amount of \$200,000 to initiate an emergency Removal Action to secure the Site and properly address substances present at the Site.

II. Background

At approximately 1300 hours on Thursday, 17 August 2000, the EPA Regional Response Center received a spill notification report from the National Response Center regarding an abandoned and unsecured facility in a residential area of the Strawberry Mansion section of north Philadelphia. The report noted that the facility contained numerous incompatibly stored drums containing various hazardous materials. Notification was made by the City of Philadelphia's Emergency Operations Center. At about the same time, a call was made by the Philadelphia Fire Department Hazardous Materials Unit (PFD-HMU) to the Regional Response Center requesting EPA assistance. OSCs Kelly and Taurino responded to the scene, arriving at approximately 1430 hours, and met with representatives of the PFD-HMU, Philadelphia Police Department (PPD), Pennsylvania Department of Environmental Protection (PADEP), and EPA's Criminal Investigation Division. The Philadelphia Police Department was in the process of conducting a criminal investigation of the facility and had recently arrested the operator on several charges including storing/processing large amounts of chemicals without a permit and risking a catastrophe. The facility consists of a three story row house (2932 West Dauphin street), an

adjacent driveway or yard area, and a warehouse (originally a stable) immediately behind the house.

Soon after arrival, OSC Taurino accompanied a PPD official to the police district office housing the facility operator. Per discussions with EPA Regional Counsel, OSC Taurino briefly met with the operator and obtained his written consent to access the facility and sample and secure its contents. Concurrently, OSC Kelly, utilizing information obtained by the PPD, visited the nearby former home of the owner of 2932 West Dauphin Street and confirmed from the current resident that the owner had died a year or more ago. Kelly could obtain no reliable information identifying the current owner of 2932 West Dauphin (the resident indicated that the former owner had willed the 2932 house to him via a handwritten note but could not provide documentation).

After the arrival of EPA's Site Assessment and Technical Assistance Team (START), OSCs Kelly and Taurino, along with START personnel and PFD-HMU representatives, conducted a walkthrough of the Site. During the walkthrough, personnel noted approximately three hundred or more 55-gallon drums and 5-gallon containers stored at the Site under haphazard and likely incompatible conditions. Many of the 5-gallon containers contained no lids and were full or half-full with unknown liquids. Approximately seventy drums and containers were located outside the house in the adjacent driveway/yard area and were easily accessible to passerby. The majority of the drums and containers were not empty. Approximately seven "tote" containers ranging from half-filled to completely filled were in the warehouse although the contents were unknown. A tote container contains more than 300 gallons of liquid.

The following labels appeared on a number of drums and containers: Flammable, Poison, Corrosive, and Solvent. Specific chemical labels identified hydrofluoric acid, glacial acetic acid, tetrahydrofuran, sodium hydroxide, ammonium hydroxide, butyl alcohol, methanol, hydrochloric acid, propanol, n-butyl methacrylate monomer, and hyamine (a germicide concentrate). One drum containing unknown contents was labeled "TSCA Listed". Miscellaneous shipping papers obtained from the facility by PFD-HMU identified the probable presence of polyethylene glycol, xylenes, ammonia, butylene glycol and nitrophenols. The majority of the chemicals listed above appear in 40 CFR Part 302, Table 302.4 "CERCLA Hazardous Substances and their Reportable Quantities".

Numerous drums, based on manufacturer labeling, appeared to contain product materials. At least one pressurized gas cylinder was identified and was marked by a flammable gas label. Numerous unlabeled drums and containers were present and it was a majority opinion of the walkthrough personnel that many of the labeled drums may contain materials different from that indicated.

Air monitoring during the inspection identified elevated volatile organic compound (VOC) readings inside the warehouse where the majority of drums and containers were stored. Access to the warehouse was restricted due to the haphazard and "tight" storage arrangement of the containers and other materials (*i.e.* pathways between the drums and containers were virtually nonexistent). This restrictive condition limited the initial assessment activities and prevented a more detailed evaluation and observation of the warehouse contents. In short, many of the drums

and containers could not be viewed for the purpose of label identification.

The interior front room of the row house contained a computer and printer along with numerous files, personal papers and product reference books. Many of the product reference books appeared to refer to lubricants. A second middle room contained a number of open five gallon containers with various colored, fragrant liquids. A bookshelf in this room contained small bottles of product liquids. The room appeared to be used for experimentation. Based on the odor in the room and a few commercially available consumer products resting on a table, it appears that the operator was attempting to manufacture hair care, auto-related polishing or personal fragrance products. The upstairs second floor appeared to be used as living and sleeping quarters. The condition of the house was poor and not well maintained (the ceiling of the middle first floor room revealed significant signs of leaking from above).

III. Threats to Public Health or Welfare or the Environment

Section 300.415 of the NCP (40 CFR 300.415) lists the factors to be considered in determining the appropriateness of a removal action. Paragraphs (b) (2) (i), (iii), (vi) and (vii) of Section 300.415 directly apply as follows to conditions at the Site.

- A. 300.415 (b) (2) (i) "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants"

The drums and containers containing hazardous substances are present both within and outside of a small warehouse located behind a row house residence along West Dauphin Street. Numerous residents maintain dwellings adjacent to and across the street from the Site (on one side of the Site row house is a vacant lot). The Site is abandoned and access is unrestricted; entrance to an area containing filled or partially filled drums and containers would merely require walking a few feet off the pavement. Many of the liquid-filled containers in this outside area are without lids or "bunghole" caps. Some drums are insecurely placed on pallets above ground level drums. The interior of the row house at the Site contains numerous liquid filled bottles and 5-gallon containers. It appears that the City of Philadelphia may not permit the operator to reside at the row house after his incarceration since the owner of the house is deceased.

- B. 300.415 (b) (2) (iii) "Hazardous substances or pollutants or contaminants in drums, barrels, tanks or other bulk containers, that may pose a threat of release;"

The hazardous substances found in drums and containers at the Site, according to container labels, include hydrofluoric acid, glacial acetic acid, sodium hydroxide, ammonium hydroxide, tetrahydrofuran, butyl alcohol, methanol, hydrochloric acid, propanol, n-butyl methacrylate monomer, and Hyamine (a germicide concentrate) in addition to other flammable liquids, corrosives and solvents with specific chemical identification unknown. A more complete characterization of what exists was not possible due to the condition of the warehouse, questions about label reliability, and the unlabeled status of numerous containers. Detailed characterization

must await sampling and analyses. The drums and containers are stored with little concern as to their compatibility and many pose a threat of release due to improper storage (e.g. double stacked, exposed to the weather). Many drums are stored outside the warehouse and are exposed to the elements, some are in deteriorated condition. Many of the 5-gallon containers and small bottles contain liquids and are open, without lids.

C. 300.415 (b) (2) (vi)

"Threat of fire and explosion"

The presence of numerous drums and containers of flammable liquids, many open and exposed, pose a significant threat of fire and explosion. The storage of containers stacked on top of each other and in close proximity to incompatible substances also increases the threat of fire and explosion should a chemical release and mixing occur. Personnel have questioned the structural soundness of the warehouse flooring, increasing the threat of containers contacting each other with force if structure failure occurred. Warehouse electrical wiring, although not inspected due to interior storage conditions, may not be up to code. The row house itself, at the least, has significant plumbing problems. The seventy or so outside containers, several with openly visible liquid, are easily accessible to passerby and trespassers.

D. 300.415 (b) (2) (vii)

"The availability of other appropriate federal or state response mechanisms to respond to the release"

Both PFD-HMU and PADEP have requested EPA assistance because they do not have the available resources to mitigate the threats posed by the Site. Neither PFD-HMU nor PADEP have the means to quickly and efficiently secure, characterize, segregate and properly recycle/dispose of the hazardous substances found at the Site.

IV. Endangerment Determination

The OSC determined, based upon information gathered from the emergency removal assessment, that the threat of a release of numerous hazardous substances presents an imminent and substantial endangerment to public health, welfare or the environment. For this reason, the OSC initiated an emergency removal action on August 17.

V. Actions and Estimate Costs

A. Actions

- * Implement measures (e.g. installing fencing, removing vegetation, clearing debris, improving outside surface areas and interior conditions) to facilitate efficient and safe performance of

the Removal Action.

- * Provide site security measures to facilitate efficient performance of the Removal Action and to prevent unauthorized access to the Site, especially to contaminated areas.
- * Provide field support facilities (e.g. trailer, phones, electrical service) to permit day-to-day operations.
- * Segregate incompatible drums, adequately close drums and containers, overpack and stage drums as necessary.
- * Use necessary means, including sampling and analyses, to identify and verify container contents.
- * Bulk or consolidate similar materials based on hazard categorization and/or other sampling and analyses.
- * Conduct sampling and analyses of the contents of drums, containers or tanks to facilitate transportation and disposal.
- * Prepare materials for off-site transportation and disposal to include overpacking, transfer to new DOT-acceptable drums, and labeling and marking as necessary. Dispose in accordance with 40 CFR Section 300.440.
- * Identify potential users of unadulterated product materials and prepare for off site DOT acceptable shipping.
- * Remove and dispose of contaminated soil, debris or interior furnishings/structures if discovered during the Removal Action and which pose a threat to human health or the environment.
- * Arrange for temporary housing of displaced residents as needed.
- * Conduct demolition if determined necessary for worker safety due to structural defects in the row house or warehouse.
- * Coordinate with State and local authorities on post-removal conditions.
- * Demobilize personnel and equipment.

B. Estimated Cost:

EPA (Direct)	\$ 15,000
EPA (Indirect)	\$ 25,000
START	\$ 35,000
ERRS	\$125,000
Total	\$ 200,000

C. Contribution to Remedial Performance

The proposed removal action is not expected to be inconsistent with or hinder any potential future remedial actions at the site. The OSC will inform the EPA Region III Site Assessment Section of actions at the site and make data available as requested.

D. Compliance with ARARs

The proposed removal action set forth in this special bulletin will comply with all environmental and health Applicable and Relevant and Appropriate Requirements (ARARs), to the extent practicable, considering the exigencies of the situation.

VII. Expected Changes in the Situation Should No Action be Taken or Action Delayed

Inaction would result in a continuing serious health threat to the nearby population. Drums and containers would deteriorate furthering the chances for chemical release. Should the site remain abandoned, a greater opportunity for trespassing and vandalism might result in chemical injury, fire, explosion, or chemical release. Building deterioration could result in damage to drums and containers, again increasing the potential for a release. It is doubtful that State or Local agencies would have the resources to adequately correct the situation; at the least, resources would greatly be extended, jeopardizing response capabilities at other unrelated incidents.

VIII. Outstanding Policy Issues

There are no known outstanding policy issues associated with the West Dauphin Street Chemical Site.

IX. Enforcement

The principal potentially responsible party (PRP) at the site appears to be the facility operator. Currently, he is incarcerated by the City of Philadelphia but likely will be released on bail. Drum labels and miscellaneous recent shipping papers obtained by the City indicate that waste materials were shipped to the Site from Pyramid Chemical Company in Pottstown, Pennsylvania, a facility subject to recent EPA Region III Superfund enforcement activities. Product manufacturer labels appearing on what seem to be product-containing drums identify a number of major U.S. chemical companies (with addresses) as the manufacturer of the drum contents. However, some or many of the drums may have been forwarded from intermediary locations before arriving at the Site and it is not clear how many may now actually contain waste or materials different from the original contents. Both the City of Philadelphia Police Department and EPA Region III's Criminal Investigations Division are actively investigating the Site and operator. The City is in the process of obtaining a search warrant.

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